

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE APPLICATION OF THE	)	
FEDERAL REPUBLIC OF NIGERIA	)	
FOR AN ORDER PERMITTING	)	Misc. Action No. MC-20-2-JD
MISCELLANEOUS DISCOVERY IN	)	
AID OF A FOREIGN PROCEEDING	)	
PURSUANT TO 28 U.S.C. § 1782.	)	

**MOTION TO ADMIT ANDREW M. HETHERINGTON PRO HAC VICE  
FOR PURPOSES OF THE ABOVE-STYLED ACTION**

COMES NOW Matthew C. Kane of Ryan Whaley, pursuant to LCvR 83.2(g) and 83.3, and in support of this Motion for Admission *Pro Hac Vice* of Andrew M. Hetherington, respectfully states as follows:

1. Movant is a member of the bar of this Court.
2. Movant respectfully requests the admission of Andrew M. Hetherington to the bar of this Court *pro hac vice* for the purpose of representing Applicant, Federal Republic of Nigeria.
3. Andrew M. Hetherington is a member of the law firm of Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C., 1615 M Street NW, Suite 400, Washington, DC 20036. Mr. Hetherington is admitted to practice in the following courts: U.S. Supreme Court; U.S. Court of Appeals for the First and Sixth Circuits; U.S. District Court for the District of Colorado; U.S. District Court for the District of Columbia; U.S. District Court for the District of Maryland; U.S. District Court for the Southern District of New York; U.S. District Court for the Western District of Tennessee; New York Supreme Court; State of New York; and District of Columbia. Mr. Hetherington is a member in good standing in

the aforementioned courts and is a member in good standing in the State Bar of New York and the District of Columbia Bar. Mr. Hetherington's Request for Admission Pro Hac Vice is attached hereto as Exhibit "1."

5. Matthew C. Kane of Ryan Whaley will serve as local counsel in the representation of Applicant, Federal Republic of Nigeria.

WHEREFORE, Matthew C. Kane respectfully requests that Andrew M. Hetherington be admitted to the bar of this Court *pro hac vice* for the purpose of representing Applicant, Federal Republic of Nigeria in the above-styled action.

*s/Matthew C. Kane*

Matthew C. Kane

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